

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In Re:	Case No.: 19-32928-MER
Rancher's Legacy Meat Co.,	Chapter 11
Debtor.	

**APPLICATION OF THE DEBTOR FOR ORDER AUTHORIZING AND APPROVING
RETENTION AND EMPLOYMENT OF FOLEY & MANSFIELD, P.L.L.P AS
COUNSEL FOR THE DEBTOR**

TO: The United States Trustee and other parties in interest identified in Local Rule 2014-1.

1. Rancher's Legacy Meat Co., the Debtor and Debtor-in-Possession (the "Debtor") makes this application for the retention of counsel to represent the Debtor in all matters pertaining to the above-referenced bankruptcy case and respectfully represents:

2. This Court has jurisdiction to consider this Application pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. §§1408 and 1409.

3. On September 20, 2019 (the "Petition Date"), the Debtor filed its voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§101 et seq. (the "Bankruptcy Code").

4. The Debtor paid Foley & Mansfield, PLLP a retainer in the amount of \$100,000.00 on September 19, 2019. The retainer was paid (i) to prepay for all pre-filing work performed in connection with this Chapter 11 case (\$38,577.50 incurred through August 31, 2019) and (ii) to hold in trust for application against Foley & Mansfield, PLLP's final allowed fees, the case filing fees and the fees and expenses incurred in the several days prior to the Petition Date, which may not have been fully paid prior to filing. Foley & Mansfield, PLLP also

represented the Debtor pre-petition in certain litigation matters, but Foley & Mansfield, PLLP is not a creditor of the Debtor.

5. This application arises under 11 U.S.C. §§ 1103 and 328 and Bankruptcy Rule 2014. This application is filed under Local Rules 2014-1 and 9013-1.

6. By this Application, the Debtor seeks to employ Foley & Mansfield, P.L.L.P., 250 Marquette Avenue, Suite 1200, Minneapolis, Minnesota 55401, and Cameron A. Lallier, an attorney duly admitted to practice before this Court, to assist it in connection with this Chapter 11 case. The Debtor believes Foley & Mansfield, P.L.L.P. is competent and experienced in Chapter 11 and related bankruptcy matters and that their employment will be in the best interests of the Debtor and the estate.

7. The hourly rates for the attorneys and paralegals who will provide these services are as follows: partners—\$425.00, associates: \$300.00, and paralegals: \$150.00.

8. This application arises under 11 U.S.C. §§ 1103 and 328 and Bankruptcy Rule 2014. This application is filed under Local Rules 2014-1 and 9013-1.

9. To the best of the Debtor's knowledge, Foley & Mansfield, P.L.L.P. and Cameron A. Lallier have no connection with any creditor, or any other party in interest or their respective attorneys in this case.

10. Foley & Mansfield, P.L.L.P. does not represent any other entity in connection with this case, does not hold or represent any interest adverse to the estate, and are disinterested within the meaning of 11 U.S.C. §§ 327(a), 328, and Bankruptcy Rule 2014.

11. As counsel for the Debtor, Foley & Mansfield, P.L.L.P. will provide the following services for the Debtor:

- a. Prepare the petition, schedules and Statement of affairs for the Debtor;

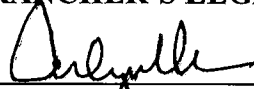
- b. Represent the Debtor at the First Meeting of Creditors;
- c. Consult with the Debtor in Possession regarding the administration of the case;
- d. Assisting with the Debtor's investigation of the acts, conduct, assets, rights, liabilities, and financial condition of the Debtor and of the operation of the Debtor's business;
- e. Prepare, file or respond to all motions, adversary proceedings and other pleadings necessary for the Debtor to administer this case;
- f. Review all claims filed in the case to prepare and file appropriate pleadings in connection therewith;
- g. Assist in the formulation of the Plan of Reorganization an Disclosure Statement, advise Debtor as to any issues relating to Plan of Reorganization an Disclosure Statement proposed and collect and file with the court acceptances and rejections of the Plan of Reorganization;
- h. Perform such other services as the Debtor believes are in the interest of Debtor and creditors of the estate.

12. The Debtor requests the fee applications for Foley & Mansfield, P.L.L.P. be heard on 90-day intervals in this case.

WHEREFORE, the Debtor respectfully requests this Court approve the Debtor's employment of the law firm of Foley & Mansfield P.L.L.P. to represent it for the purposes set forth herein.

Dated: September 24, 2019.

RANCHER'S LEGACY MEAT CO.



Arlyn J. Lomen, President

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In Re:

Rancher's Legacy Meat Co.,

Debtor.

Case No.: 19-32928-MER

Chapter 11

AFFIDAVIT OF PROPOSED ATTORNEY


Cameron A. Lallier, being duly sworn on oath, deposes and says:

1. I am an attorney and a partner in the law firm of Foley & Mansfield, P.L.L.P., 250 Marquette Avenue, Suite 1200, Minneapolis, Minnesota, admitted to practice before the state and federal courts of Minnesota.

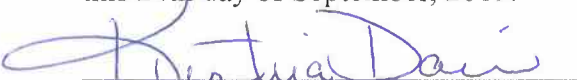
2. Foley & Mansfield, P.L.L.P., has no connection with any creditor of the Debtor, or any other party in interest herein, or its respective attorneys and does not hold or represent any interest adverse to the Debtor or the estate. Foley & Mansfield, P.L.L.P. has no connection with the United States Trustee or any person employed in the office of the United States Trustee.

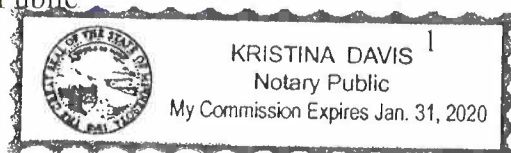
3. Neither the law firm of Foley & Mansfield, P.L.L.P., no affiant represents any interest adverse to the Debtor. Foley & Mansfield, P.L.L.P. does not represent any other entity in connection with this case, does not hold or have any interest in the Debtor or its assets and are disinterested within the meaning of 11 U.S.C. § 327(a) and Bankruptcy Rule 2014.

Dated: September 24, 2019


Cameron A. Lallier, Partner

Subscribed and sworn to before me
this 24th day of September, 2019.


Notary Public



**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In Re:	Case No.: 19-32928-MER
Rancher's Legacy Meat Co.,	Chapter 11
Debtor.	

**ORDER UNDER 11 U.S.C. §§ 328 AND 1103 AUTHORIZING THE
RETENTION AND EMPLOYMENT OF FOLEY & MANSFIELD, P.L.L.P. AS
COUNSEL FOR THE DEBTOR**

Upon the Application (the "Application") of Rancher's Legacy Meat Co., the Debtor and Debtor-in-Possession in the above-captioned Chapter 11 case (the "Debtor"), for entry of an Order under 11 U.S.C. §§ 328 and 1103 authorizing the retention of the law firm of Foley & Mansfield, P.L.L.P. to represent the Debtor in this case.

IT IS HEREBY ORDERED ADJUDGED AND DECREED THAT:

1. The Application is GRANTED. In accordance with 11 U.S.C. §§ 328 and 1103, the Debtor is authorized to employ Foley & Mansfield to perform the services as set forth in the Application. The effective date of this authorization shall be governed by Local Rule 2014-1(b).

2. Foley & Mansfield may file fee applications every 90-day intervals from the commencement of the case and receive payment on monthly basis, subject to the holdback of 20% of the invoiced fees as provided in Instruction 9(c) of this Court's published Instructions for Filing a Chapter 11 case.

Dated this ____ day of September, 2019.

Hon. Michael E. Ridgway
United States Bankruptcy Judge